

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 10 2005

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Greensburg, Kansas, and
Alva, Medford, and Mustang, Oklahoma)

Federal Communications Commission
Office of Secretary

) MB Docket No. _____
) RM - _____
)
)

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

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SUPPLEMENT TO PETITION FOR RULE MAKING

Chisholm Trail Broadcasting Co. ("Chisholm Trail"), licensee of Station KNID(FM), Alva, Oklahoma, by its counsel, hereby supplements its Petition for Rule Making filed on May 9, 2005, which proposed to (i) delete Channel 259C1 at Alva, Oklahoma and allot Channel 259C2 to Mustang, Oklahoma, as that community's first local service, (ii) allot Channel 260C3 to Medford, Oklahoma, as that community's first local service, and (iii) allot Channel 259C1 to Greensburg, Kansas, as that community's first local service. Chisholm Trail inadvertently omitted the Engineering Statement from the Technical Exhibit. Therefore, attached to this Supplement is a copy of the Engineering Statement.

Respectfully submitted,
CHISHOLM TRAIL BROADCASTING CO.

By: Mark N. Lipp
Mark N. Lipp
Scott Woodworth
Vinson & Elkins LLP
1455 Pennsylvania Ave, NW
Suite 600
Washington, DC 20004-1008
(202) 639-6500

By: Andrew S. Kersting (by HNL)
Andrew S. Kersting
Dickstein Shapiro, Morin & Oshinsky, LLP
2101 L Street, NW
Washington, DC 20037-1526
(202) 785-9700

May 10, 2005

Its Co-Counsel

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List ABCDE

JOHN J. MULLANEY
JOHN H. MULLANEY, P.E. (1994)
ALAN E. GEARING, P.E.
TIMOTHY Z. SAWYER

301 921-0115 Voice
301 590-9757 Fax
Mullaney@MullEngr.com

MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 259C1 AT ALVA, OK
ALLOT CH. 259C2 TO MUSTANG, OK
ALLOT CH. 260C3 TO MEDFORD, OK
ALLOT CH. 259C1 TO GREENSBURG, KS**

MAY 9, 2005

**ENGINEERING STATEMENT PREPARED ON BEHALF OF
CHISHOLM TRAIL BROADCASTING CO.**

**LICENSEE OF KNID(FM)
CHANNEL 259C1 - ALVA, OK**

Facility ID: 37123



ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 259C1 AT ALVA, OK
ALLOT CH. 259C2 TO MUSTANG, OK
ALLOT CH. 260C3 TO MEDFORD, OK
ALLOT CH. 259C1 TO GREENSBURG, KS**

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Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Chisholm Trail Broadcasting Co., licensee of Radio Station KNID(FM), at Alva, OK (Facility ID 37123), to prepare the instant engineering exhibit in support of a rule making petition to amend the FM Table of Allotments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.


John J. Mullaney, Consulting Engineer

Executed on the 9th day of May 2005

ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 259C1 AT ALVA, OK
ALLOT CH. 259C2 TO MUSTANG, OK
ALLOT CH. 260C3 TO MEDFORD, OK
ALLOT CH. 259C1 TO GREENSBURG, KS**

NARRATIVE STATEMENT:

This engineering statement has been prepared on behalf of Chisholm Trail Broadcasting Co., licensee of Radio Station KNID(FM), at Alva, OK (Facility ID 37123). Pursuant to MM Docket No. 98-155, effective May 9, 2005, KNID has been authorized to move back to its previous FM Channel 259C1 at Alva, OK, utilizing its existing licensed site. The purpose of this statement is to provide engineering in support of a rule making petition to amend the FM Table of Allotments to delete Ch. 259C1 at Alva, OK and re-allot Ch. 259C2 to Mustang, OK (Canadian County), and to modify the license of KNID(FM) accordingly. In addition, KNID wishes to propose two new allotments that can be made as of a result of the move to Mustang, OK. Allot Ch. 260C3 to Medford, OK (Grant County) and Ch. 259C1 to Greensburg, KS (Kiowa County). Both allotments would be a first service.

The city of Alva, OK, (Woods County) will continue to be served by three FM services & one AM service and grant of this proposal will result in the **first** aural service to Mustang, OK (Canadian County).

KNID(FM) wishes to point out that the channel it seeks is on its existing channel with a proposed location which is less than the separation specified by Section 73.207 and, therefore, it is not necessary to demonstrate the availability of an additional equivalent channel in accordance with Section 1.420(g) of the rules.

The proposed reference point is not within 290 kilometers (180 miles) of a United States Border and, therefore, foreign concurrence is not required.

Proposed Special Reference - Mustang, OK

For the purposes of this rule making the applicant proposes a special reference point which is 22.5 km (14.0 miles) on a bearing of N-331-E (northwest) from Mustang, OK.

N. Latitude:	35°	33'	40"	NAD-27
W. Longitude:	97°	50'	40"	

The proposed reference site will provide an unobstructed view of the city of license, Mustang, OK and is located close enough to serve the entire community with the required 3.16 mV/M or 70 dBu contour.

Figure 1 is a Channel 259C2 Allocation Study from a special reference point. The study indicates the actual & required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From this study it can be determined that proposed reference point exceeds all of these minimum separations.

It should be noted that the proposal to Add Ch. 259A at Lexington, OK, is subject to dismissal as a result of Docket 98-155 (see legal portion of this RM petition).

The licensed site of KNID(FM) is located 120.7 km (75.0 miles) away whereas the required co-channel separation is 224 km (139.2 miles). Therefore, the proposed substitution is in accordance with Section 1.420(g) and is not required to demonstrate the availability of an additional equivalent channel.

Figure 2 is a map which compares the existing 60 dBu contour at Alva (94,935 persons) and proposed 60 dBu contour at Mustang (906,045). The move to Mustang will serve 811,110 additional persons or **9.5 times** the population currently being served. The map also demonstrates that the C2 allotment circle completely encompasses the boundaries of Mustang, OK. In addition, the map outlines the Urbanized Area of Oklahoma City. The allotment circle will encompass **58%** of the population and **55%** of the area within the Urbanized Area.

Figure 3 is a map illustrating the other aural services to the KNID licensed 60 dBu contour (loss area). During daytime hours the entire area will continue to be served by at least four aural services. During nighttime hours there are three areas which will be reduced from three to two services. However, the proposed allotment for 260C3 at Medford, OK, will serve two of these areas.

Proposed City Reference - Medford, OK

For the purposes of this rule making the applicant proposes to use the official city reference coordinates for Medford, OK.

N. Latitude:	36°	48'	25"	NAD-27
W. Longitude:	97°	44'	00"	

The proposed reference site will provide an unobstructed view of the city of license, Medford, OK and is located close enough to serve the entire community with the required 3.16 mV/M or 70 dBu contour.

Figure 4 is a Channel 260C3 Allocation Study from a city reference point. The study indicates the actual & required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From this study it can be determined that proposed reference point exceeds all of these minimum separations. The 60 dBu allotment circle will encompass 14,030

persons. This RM proposes to delete KNID on 259C1/C0 from Alva, OK.

Proposed Special Reference - Greensburg, KS

For the purposes of this rule making the applicant proposes a special reference point which is 30.7 km (19.1 miles) on a bearing of N-186-E (south) from Greensburg, KS.

N. Latitude:	37°	19'	40"	NAD-27
W. Longitude:	99°	19'	45"	

The proposed reference site will provide an unobstructed view of the city of license, Greensburg, KS and is located close enough to serve the entire community with the required 3.16 mV/M or 70 dBu contour.


Figure 5 is a Channel 259C1 Allocation Study from a special reference point. The study indicates the actual & required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From this study it can be determined that proposed reference point exceeds all of these minimum separations. The 60 dBu allotment circle will encompass 30,120 persons. This RM proposes to delete KNID on 259C1/C0 from Alva, OK. The Greensburg allotment will be mutually exclusive with a recent filing for Ch. 259C3 at Ashland, KS.

SUMMARY

Chisholm Trail Broadcasting Co., licensee of Radio Station KNID(FM), at Alva, OK (Facility ID 37123) requests that the FM Table of Allotments be amended to delete Ch. 259C1 at Alva, OK and re-allot Ch. 259C2 to Mustang, OK as a first service, and to modify the license of KNID(FM) accordingly. In addition, KNID wishes to propose two new first service allotments that can be made as of a result of the move to Mustang, OK. Allot Ch. 260C3 to Medford, OK and Ch. 259C1 to Greensburg, KS.

	Present	Proposed
Alva, OK	248C2, 259C1 , 289C2, 296C3	248C2, 289C2, 296C3
Mustang, OK	- - -	259C2
Medford, OK	- - -	260C3
Greensburg, KS	- - -	259C1

KNID(FM) believes that the proposed change in community and allotment of two new services will serve the public interest. If granted, KNID(FM) will quickly file an application for construction permit at Mustang and will file auction applications for Medford & Greensburg.



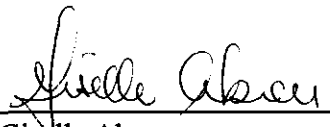
John J. Mullaney, Consulting Engineer

May 9, 2005.

CERTIFICATE OF SERVICE

I, Giselle Abreu, in the law firm of Vinson & Elkins, LLP, do hereby certify that I have on this 10th day of May, 2005, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Supplement to Petition for Rule Making**" to the following:

Charles Crawford
4553 Bordeaux Ave.
Dallas, TX 75205
(*Petitioner for Lexington, Oklahoma*)



Giselle Abreu